

PROPOSED VERDICT FORM

We, the jury, unanimously find with respect to the claims of Plaintiff as follows (place an “X” on the appropriate line for each claim):

1. CLAIM I – PROCEDURAL DUE PROCESS

1a. For Defendant Melissa Elliott

OR

_____ For Plaintiff
_____ For Defendant

1b. For Defendant Tricia Carlson

OR

_____ For Plaintiff
_____ For Defendant

2. CLAIM II – PROCEDURAL DUE PROCESS, INSTITUTIONAL CLAIMS

For Defendant Sheriff Earnell Lucas

OR

_____ For Plaintiff
_____ For Defendant

**IF YOU FOUND FOR DEFENDANTS ON ALL CLAIMS ABOVE, DO NOT COMPLETE THE
BELOW SECTION RELATED TO CAUSATION, AND PROCEED TO SIGN THE VERDICT
FORM ON THE LAST PAGE.**

**IF, HOWEVER, YOU FOUND FOR PLAINTIFF ON ONE OR MORE OF THE CLAIMS
ABOVE, CONTINUE BELOW TO THE NEXT SECTION ON CAUSATION BEFORE SIGNING
THE VERDICT FORM ON THE LAST PAGE.**

3. Damages – Causation

*For each defendant – answer **ONLY** if you found against that particular defendant on one or more Counts above. If you did not find against a defendant on any claim, skip this section for that particular defendant.*

3a. Defendant Melissa Elliott

Do you find that the procedural due process violation by Defendant Melissa Elliott was a factual cause in an injury to Robert Tatum? (Answer **only** if you found that Defendant Elliott was deliberately indifferent in Claim I, above).

YES _____ NO _____

3b. Defendant Tricia Carlson

Do you find that the procedural due process violation by Defendant Tricia Carlson was a factual cause in an injury to Robert Tatum? (Answer **only** if you found that Defendant Carlson was deliberately indifferent in Claim I, above).

YES _____ NO _____

3c. Defendant Sheriff Earnell Lucas

Do you find that the procedural due process violation by Defendant Earnell Lucas was a factual cause in an injury to Robert Tatum? (Answer **only** if you found that Defendant Lucas was deliberately indifferent in Claim II, above).

YES _____ NO _____

Jury Signatures

SO SAY WE ALL:

Foreperson

Dated: _____